

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMELIA ROSKIN-FRAZEE,

Plaintiff,

v.

COLUMBIA UNIVERSITY,

Defendant.

No. 17-cv-2032 (GBD)

**DECLARATION OF ROBERTA A. KAPLAN
IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS THE COMPLAINT**

ROBERTA A. KAPLAN declares as follows:

1. I am a member of the law firm of Paul, Weiss, Rifkind, Wharton & Garrison, and am counsel for Columbia University ("Columbia") in this action. I respectfully submit this declaration in support of Columbia's motion to dismiss the Complaint.
2. A true and correct copy of Columbia's Gender-Based Misconduct Policy for Students, dated September 1, 2015, is attached hereto as Exhibit 1.
3. A true and correct copy of the Investigative Interview of Plaintiff, dated September 8, 2016, is attached hereto as Exhibit 2.
4. A true and correct copy of Plaintiff's Investigation File is attached hereto as Exhibit 3.
5. A true and correct copy of a transcription of an October 13, 2015 phone call between Plaintiff and a representative from Columbia's Sexual Violence Response Hotline is attached hereto as Exhibit 4.

6. A true and correct copy of Plaintiff's Columbia Health Record, dated October 12, 2015, is attached hereto as Exhibit 5.
7. A true and correct copy of a letter to Plaintiff from Columbia's Associate Vice President, Student Conduct and Community Standards, dated October 24, 2016, is attached hereto as Exhibit 6.
8. A true and correct copy of email correspondence between Plaintiff and her Academic Advisor, dated October 14-16, 2015, is attached hereto as Exhibit 7.
9. A true and correct copy of Plaintiff's Case Management File is attached hereto as Exhibit 8.
10. A true and correct copy of the Incident Report filed by Plaintiff, dated August 5, 2016, is attached hereto as Exhibit 9.
11. A true and correct copy of a letter to Plaintiff from Columbia's Associate Vice President, Student Conduct and Community Standards, dated August 8, 2016 is attached hereto as Exhibit 10.
12. A true and correct copy of a letter to Plaintiff from her Case Manager, dated August 15, 2016, is attached hereto as Exhibit 11.
13. A true and correct copy of email correspondence between Plaintiff and an officer in Columbia's Office of Public Safety, dated September 16, 2016, is attached hereto as Exhibit 12.
14. A true and correct copy of a letter to Plaintiff from a Title IX Investigator, dated October 17, 2016, is attached hereto as Exhibit 13.
15. A true and correct copy of email correspondence between Plaintiff and a Title IX Investigator, dated October 19, 2016, is attached hereto as Exhibit 14.

16. A true and correct copy of contemporaneous notes of communications between Plaintiff and a Survivor Advocate, dated October 14, 2015, is attached hereto as Exhibit 15.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed at: New York, New York
June 5, 2017



Roberta A. Kaplan